

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

<hr/>	:	CIVIL ACTION
BLACKWATER SECURITY CONSULTING,	:	
LLC, a Delaware Limited Liability Company;	:	
and BLACKWATER LODGE AND	:	
TRAINING CENTER, INC., a Delaware	:	
Corporation,	:	Civil Action No. 2:05-cv-06020-PBT
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
WESTCHESTER SURPLUS LINES	:	
INSURANCE COMPANY, a Georgia	:	
Corporation; EVANSTON INSURANCE	:	
COMPANY, an Illinois Corporation;	:	
FIDELITY AND CASUALTY COMPANY	:	
OF NEW YORK, a South Carolina	:	
Corporation; and LIBERTY INSURANCE	:	
UNDERWRITERS, a Massachusetts	:	
Corporation,	:	
	:	
Defendants.	:	
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**DEFENDANT FIDELITY AND CASUALTY COMPANY'S MOTION FOR
ADMISSION *PRO HAC VICE* OF THOMAS T. LOCKE, ESQUIRE**

Defendant Fidelity and Casualty Company of New York (hereinafter "Fidelity"), by its counsel, files this application, pursuant to Local Rule of Civil Procedure 83.5.2, for the admission *pro hac vice* of Thomas T. Locke, Esquire, and, in support, thereof, avers as follows:

1. Mr. Locke is a partner in the Washington, D.C. office of Seyfarth Shaw LLP, 815 Connecticut Avenue, N.W., Washington, D.C. 2006-4004. Seyfarth Shaw LLP represents Fidelity in this matter.
2. Mr. Locke is a member in good standing of the bar in the District of Columbia

and has been admitted to practice in the District of Columbia since 1997. He has also been admitted to practice in and is a member in good standing of the bars of the State of Maryland, the U.S. Supreme Court, the U.S. Court of Appeal for the Fourth, Eleventh and District of Columbia Circuits, the United States District Court for the District of Columbia and the United States District Court for the District of Maryland.

3. Mr. Locke has not been denied admission or been disciplined by any court.

4. Mr. Locke, in the past, has reviewed the Local Rules of this Honorable Court.

5. Fidelity respectfully requests that there is good cause for the admission of Mr. Locke *pro hac vice* because Mr. Locke has experience handling other insurance coverage matters in the Commonwealth of Pennsylvania and other jurisdictions.

6. Fidelity further respectfully requests that this motion be granted so that Mr. Locke may attend and participate in all matters on its behalf and otherwise engage in pre-trial, trial, and post-trial proceedings in connection with this action.

7. This motion is made by Ronald P. Schiller, Esquire, who is a member in good standing of the bar of the Commonwealth of Pennsylvania and State of New York; the United States District Courts for the Eastern District of Pennsylvania, the Middle District of Pennsylvania and the Southern District of New York; and the United States Court of Appeals for the Third Circuit.

WHEREFORE, Defendant Fidelity and Casualty Company of New York respectfully requests that the application for admission *pro hac vice* of Mr. Locke, Esquire, be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald P. Schiller", is written over a horizontal line.

Ronald P. Schiller
Michael R. Carlson
Attorneys for defendant
Columbia Casualty Company
Piper Rudnick LLP
3400 Two Logan Square
18th and Arch Streets
Philadelphia, PA 10103
(215) 656-3300
(215) 656-3301 - Facsimile

Dated: March 9, 2007.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**BLACKWATER SECURITY CONSULTING,
LLC, a Delaware Limited Liability Company;
and BLACKWATER LODGE AND
TRAINING CENTER, INC., a Delaware
Corporation,**

Plaintiffs,

v.

**WESTCHESTER SURPLUS LINES
INSURANCE COMPANY, a Georgia
Corporation; EVANSTON INSURANCE
COMPANY, an Illinois Corporation;
FIDELITY AND CASUALTY COMPANY
OF NEW YORK, a South Carolina
Corporation; and LIBERTY INSURANCE
UNDERWRITERS, a Massachusetts
Corporation,**

Defendants.

CIVIL ACTION

Civil Action No. 2:05-cv-06020-PBT

VERIFICATION

I hereby certify that the information contained in my Application for Admission Pro Hac

Vice is true and accurate to the best of my knowledge, information, and belief.



Thomas T. Locke
Seyfarth Shaw LLP
815 Connecticut Avenue, N.W.,
Washington, D.C. 2006-4004

Dated: March 8, 2007.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

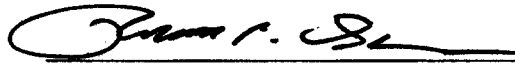
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Corporation; and LIBERTY INSURANCE	:	
UNDERWRITERS, a Massachusetts	:	
Corporation,	:	
	:	
Defendants.	:	
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LOCAL COUNSEL ENDORSEMENT

By my signature below, be it known that I hereby consent to the Application for Admission Pro Hac Vice of Mr. Locke in the above-captioned matter and that I will participate in this action as local attorney in the manner required by Local Rule of Civil

Procedure 83.5.2, United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald P. Schiller", written over a horizontal line.

Ronald P. Schiller/RPS4415
Michael R. Carlson
DLA Piper US LLP
One Liberty Place
1650 Market Street, Suite 4900
Philadelphia, PA 19103-2762
(215) 656-3330

Attorneys for Fidelity and Casualty Company of New
York

Dated: March 9, 2007.

CERTIFICATE OF SERVICE

I, Michael R. Carlson, hereby certify that on March 9, 2007, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice was filed electronically and it is available for viewing and downloading from the ECF system; a true and correct copy of same was sent via U.S. first-class mail, postage pre-paid, upon the following:

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MRC3515

Michael R. Carlson